



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

May 25, 2007

BY FACSIMILE

The Honorable Leonard B. Sand
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Kokabani and Mohsin,
07 Cr. 394 (LBS)

Dear Judge Sand:

This matter was assigned to Your Honor on May 8, 2007, and was referred by your deputy to the duty Magistrate Judge for Presentment and Arraignment on May 10, 2007. An initial pre-trial conference before Your Honor has been scheduled for May 31, 2007, at 9:45 a.m. Enclosed please find a copy of the Indictment for Your Honor's files.

Further, as to defendant Adel Mohsin, the Government respectfully requests that the Court exclude time from today until May 31, 2007, pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(8)(A). The ends of justice served by such continuance outweigh the interest of the public and the defendant in a speedy trial because the continuance will

Enclavement

Speedy trial exclusion
order until 5/31/07 granted
on consent.

5/29/07

So added
Sand
6/9/07

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allow the Government to begin to produce discovery, and have any appropriate discussions regarding a possible disposition of this case. Stuart Frankel, Esq., counsel for the Mohsin, consents to this request for the exclusion of time.

Respectfully submitted,

MICHAEL J. GARCIA
United States Attorney

By:



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Encl.

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